

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

CSX Transportation, Inc.

Plaintiff,

v.

Newhaven Distribution Services, Inc.

Defendant.

CASE NO: 1:20-cv-07123

**MOTION FOR ADMISSION *PRO*
*HAC VICE***

Pursuant to Local Civil Rule 1.3 of the United States Courts for the Southern and Eastern Districts of New York, I, Eric Christian Palombo hereby move this Court for an Order for admission to practice *pro hac vice* to appear as counsel for Plaintiff, CSX Transportation, Inc.

I am in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey, and there are no pending disciplinary proceedings against me in any state or federal court. Attached hereto as Exhibit A are my Certificates of Good Standing from the Supreme Courts of Pennsylvania and New Jersey.

Dated: December 8, 2020

Respectfully submitted,

/s/ Eric C. Palombo

Eric C. Palombo

KEENAN COHEN & MERRICK, P.C.

125 Coulter Avenue, Suite 1000

Ardmore, PA 19003

Tel.: (215) 609-1110

Fax: (215) 609-1117

epalombo@freightlaw.net

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**DECLARATION OF ERIC C.
PALOMBO IN SUPPORT OF
MOTION FOR ADMISSION *PRO
HAC VICE***

I, Eric C. Palombo, declare as follows:

1. I am an attorney duly admitted to practice in the courts of the Commonwealth of Pennsylvania and the State of New Jersey.

2. I am submitting this affidavit in support of my motion for admission *pro hac vice*.

3. I have never been convicted of a felony.

4. I have never been censured, suspended, disbarred or denied admission or readmission by any court.

5. There have been no disciplinary proceedings instituted against me or any suspension or any license, certificate or privilege to appear before any judicial, regulatory or administrative body, or any resignation or termination in order to avoid disciplinary or disbarment proceedings.

WHEREFORE, I, Eric Christian Palombo, hereby respectfully request from this Court an order for admission to practice *pro hac vice* to appear as counsel for plaintiff, CSX Transportation, Inc. in the above-captioned action.

Dated: December 8, 2020

Respectfully submitted,

/s/ Eric C. Palombo

Eric C. Palombo

KEENAN COHEN & MERRICK, P.C.

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CERTIFICATE OF SERVICE

I hereby certify that on December 8, 2020, I electronically filed the foregoing Motion for Admission *Pro Hac Vice* and Exhibit A with the Clerk of Court using the CM/ECF system, which will send notice of electronic filing to all counsel of record.

/s Eric C. Palombo

Eric C. Palombo

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**[PROPOSED] ORDER GRANTING
ADMISSION *PRO HAC VICE***

The motion of Eric Christian Palombo for admission to practice *pro hac vice* in the above-captioned action is granted. Applicant has declared that he is a member in good standing of the Bars of the Commonwealth of Pennsylvania and the State of New Jersey and that his contact information is as follows:

Eric C. Palombo
Keenan Cohen & Merrick, P.C.
125 Coulter Avenue, Suite 1000
Ardmore, PA 19003
Tel.: (215) 609-1110
Fax: (215) 609-1117
epalombo@freightlaw.net

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Plaintiff CSX Transportation, Inc.;

IT IS HEREBY ORDERED that Applicant is admitted to practice *pro hac vice* in the above-captioned action in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: _____

Honorable Alison J. Nathan
United States District Judge

EXHIBIT A



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Eric Christian Palombo, Esq.

DATE OF ADMISSION

November 21, 2020

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal

Dated: November 23, 2020

A handwritten signature in black ink, reading "Patricia A. Johnson".

Patricia A. Johnson
Chief Clerk

Supreme Court of New Jersey



Certificate of Good Standing

This is to certify that

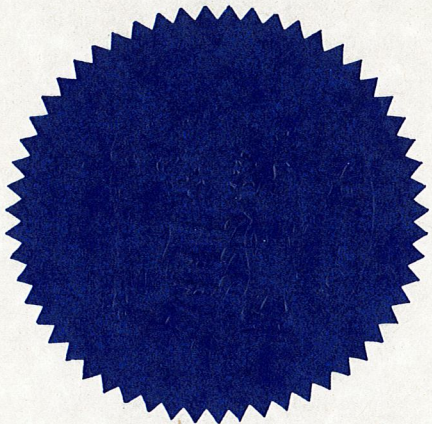
Eric C Palombo

(No. **011982009**) was constituted and appointed an Attorney at Law of New Jersey on **December 3, 2009** and, as such, has been admitted to practice before the Supreme Court and all other courts of this State as an Attorney at Law, according to its laws, rules, and customs.

I further certify that as of this date, the above-named is an Attorney at Law in Good Standing. For the purpose of this Certificate, an attorney is in "Good Standing" if the Court's records reflect that the attorney: 1) is current with all assessments imposed as a part of the filing of the annual Attorney Registration Statement, including, but not limited to, all obligations to the New Jersey Lawyers' Fund for Client Protection; 2) is not suspended or disbarred from the practice of law; 3) has not resigned from the Bar of this State; and 4) has not been transferred to Disability Inactive status pursuant to Rule 1:20-12.

Please note that this Certificate does not constitute confirmation of an attorney's satisfaction of the administrative requirements of Rule 1:21-1(a) for eligibility to practice law in this State.

*In testimony whereof, I have
hereunto set my hand and
affixed the Seal of the
Supreme Court, at Trenton, this
4th day of December, 20 20 .*



Heather J. Baker
Clerk of the Supreme Court